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Before the  
Federal Communications Commission  
Washington, D.C. 20554

AUG 20 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
Petition by the U.S.	)	File No. NSD-L-98-380
Department of Transportation for	)	CC Docket No. 92-105
Assignment of an	)	
Abbreviated Dialing Code	)	

REPLY COMMENTS ON PETITION FOR ASSIGNMENT

MCI WorldCom, Inc. ("MCI WorldCom") files these reply comments in response to the Petition for Assignment ("Petition") filed by the Department of Transportation ("DOT") requesting that the Federal Communications Commission ("Commission") designate the nationwide assignment of the 211 dialing code for access to travel-related information to the public.

More than 50 parties filed comments on the petition, the vast majority from the public transportation and safety sectors supporting the DOT petition and demonstrating the intense interest and support the public has for such national abbreviated dialing public information products. The response also underscores the need to address critical issues of supply and demand for such a rare resource as N11 numbers.

MCI WorldCom supports the use of abbreviated dialing arrangements to serve important public service goals, such as the function proposed by DOT, and believes the public can be well served by a broad supply of such information services. But essential

questions remain to be decided in a rulemaking by the Commission before this numbering resource is exhausted.

MCI WorldCom agrees with Sprint PCS that the government's interest is promoted by facilitating public access to traveler information, regardless of the source of information.<sup>1</sup> Neither the governmental nor the public interest is promoted by limiting N11 access to governmental sources of information only.

The Commission should release a notice of proposed rulemaking proposing a comprehensive framework for administration of N11 codes and other abbreviated dialing arrangements. The Commission should also decide whether N11 codes should be used for commercial pay-per-call services and should prohibit any carrier-specific tariffing or other use of N11 codes until this inquiry is concluded. BellSouth Corp. and Cox Enterprises, Inc. note in the record that they use N11 for commercial pay-per-call services.<sup>2</sup>

In today's multi-carrier competitive environment, an incumbent local exchange carrier's use of numbering resources for commercial services that are not available for competitive LECs (CLEC) cannot be allowed. Sections 251(e) and 251(b)(3) of the Act require that numbering resources must be assigned "equitably" to all carriers and that

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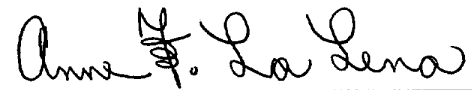
<sup>1</sup> See Sprint PCS Comments, page 2.

<sup>2</sup> See Cox Enterprises, Inc. Comments, page 1. BellSouth Corp. Comments, page 3.

incumbent LECs must make "dialing parity" available for competitors, thus precluding the carrier-specific numbering services that use public NANP numbers and which cannot be dialed by customers of other carriers.

Respectfully submitted,

MCI WorldCom Inc.

A handwritten signature in cursive script, reading "Anne F. La Lena". The signature is written in dark ink and is positioned above a horizontal line.

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## CERTIFICATE OF SERVICE

I, Barbara Nowlin, hereby certify that a copy of the foregoing MCIWorldCom Reply Comments on the Petition for Assignment File No. NSD-L-98-380 and CC Docket No. 92-105 was served on this 20th day of August by first class mail upon the following:

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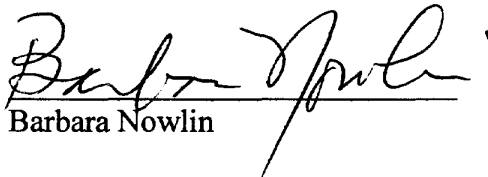
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